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*Prepped by Candice Davis*

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***Document Number:***

**24) IV-D-82**

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***Docket Number:***

**A-90-16**

A-90-16  
IV-D-82

## ETHYL CORPORATION

## GOVERNMENT RELATIONS

Lt. Gen. Jeffrey G. Smith, U.S.A.(Ret.)  
Director of Government Relations

1155 Fifteenth Street, N.W., Suite 611

Washington, D.C. 20005

(202) 223-4411

10 August 1990

AUG 10 1990

Ms. Mary T. Smith  
Director, Field Operations and Support Division (EN-397F)  
U.S. Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

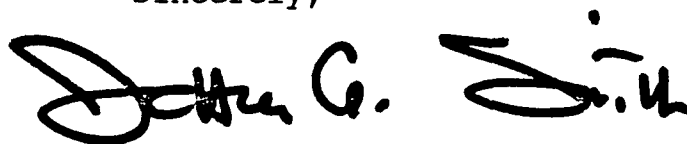
Dear Ms. Smith,

Enclosed are copies of letters from two of the principal oil firms in Canada. The letters state a successful use of MMT in Canada; point out that no catalyst problems attributable to MMT have been encountered; and state that auto companies have presented no evidence of catalyst damage attributable to MMT.

No copies of the PetroCanada letter (dated 26 June 1990) or the Imperial Oil - Esso letter (dated 18 July 1990) have apparently been sent to the HiTEC 3000 docket (A-90-16). At least none were present as of 1000 hours, 10 Aug 1990.

These copies are provided for the record in the event the original letters failed to reach you. We would appreciate their inclusion in the docket.

Sincerely,



cf: James Caldwell, Acting Chief, Field Opns & Compliance Policy  
Branch  
Clerk of the Docket (File A-90-16)

A-90-16  
IV-D-82

Petro-Canada Products

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Produits Petro-Canada

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June 26, 1990

RECEIVED  
AUG 1 0 1990

Mary T. Smith  
Director, Field Operations and Support Division (EN-397F)  
U. S. Environmental Protection Agency  
401 M Street SW  
Washington, D. C. 20460

Dear Ms Smith

Docket A-90-16 (Ethyl HITEC 3000 MMT Waiver Application)

Petro-Canada is one of the largest retailers of gasoline in Canada and attached is a copy of our annual report which describes our operations.

In support of Ethyl's waiver application, we at Petro-Canada wish to relate our experience concerning the use of MMT in unleaded gasoline in Canada.

In common with the other major gasoline producers, we have sold MMT containing gasoline in Canada since 1976 at up to twice the concentration applied for in the above waiver. Thus Canadian automobiles have collectively been exposed to MMT for many millions of miles and many individual vehicles to well over 100,000 miles of operation. We have not had a single complaint referencing catalyst plugging.

In addition, our research department has examined a number of catalysts from our high mileage in-house test fleet without finding evidence of catalyst plugging.

We have discussed the issue several times with the auto manufacturers and are aware of their concerns; however, they have not submitted any evidence that MMT is associated with catalyst plugging.

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Mary T. Smith

Page 2

June 26, 1990

In summary, Petro-Canada has found MMT to be a cost effective means of achieving the required octane levels in unleaded gasoline. We are not aware of any catalyst related problems that would preclude its use even at twice the concentration applied for in the waiver application.

Yours truly



R. E. Dart  
Senior Director  
Supply & Refining Department

dlc

attachment

bcc: D. C. Wilson, President (w/o a)  
Ethyl Canada

W. W. Brand (w/o a)  
T. Matsushita (w/o a)